

**FERGUSON, SCHETELICH & HEFFERNAN, P.A.**

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May 15, 2001

The Honorable Judge J. Frederick Motz  
United States District Court  
for the District of Maryland  
101 West Lombard Street  
Baltimore, Maryland 21201  
**VIA HAND DELIVERY**

Re: *Whiting-Turner Contracting Co. v.*  
*Mass. Electric Construction Co.*  
Civil No.: JFM 00 835  
and  
*Mass Electric Construction Co.,*  
*v. Whiting-Turning Contracting Co.*  
Civil No.: JFM 00 1885  
Our File No. 00-0171

Dear Honorable Judge Motz:

This law firm represents the interest of Mass Electric Construction Company in the captioned case. Mass Electric and Whiting-Turner Contracting Company respectfully request your approval of their agreement to extend the current discovery schedule and to extend the Discovery Deadline to October 31, 2001. The parties have exchanged thousands of documents. As you may recall, this matter involves claims for contract balances, extra work, and delay and inefficiency damages on the Central Light Rail Project at Hunt Valley, Baltimore Washington International Airport and Penn Station. Whiting-Turner has provided Answers to Interrogatories from Mass. Electric and is currently supplementing them. Mass. Electric is preparing Answers to Interrogatories from Whiting-Turner. Due to the volume of documents being reviewed and the detail of the information being sought in the Interrogatories, the discovery process is taking somewhat more time than usual. Under the circumstances, we believe that the requested extensions are both reasonable and necessary and will not prejudice either party.

If the Court approves, the parties request that the existing scheduled be changed as follows:

(24)  
RL

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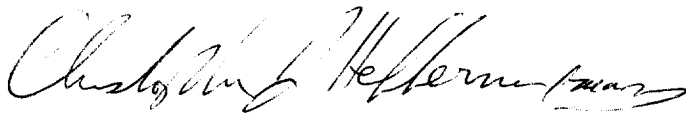
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	<u>Current Schedule</u>	<u>Revised Schedule</u>
Deadline for Mass Electric to make Rule 26(a)(2) disclosures, except opinions	May 21, 2001	June 11, 2001
Mediation Conference	June 20, 2001	June 20, 2001
Deadline for Mass Electric to make disclosures of expert opinions	June 29, 2001	August 8, 2001
Deadline for Whiting-Turner to make disclosure of rebuttal expert opinions	July 20, 2001	September 7, 2001
Discovery deadline	September 6, 2001	October 31, 2001

Mr. Huddles, counsel for Whiting-Turner, and I have reviewed the contents of this letter and he has authorized us to state that he is in agreement with the extension being requested herein.

Respectfully submitted,

FERGUSON, SCHETELICH & HEFFERNAN, P. A.



By: Christopher J. Heffernan  
CJH\dms

cc: William M. Huddles, Esquire(via facsimile)  
Kieran Meagher, Esquire

**APPROVED AND SO ORDERED**

  
Chief Judge  
United States District Court

  
Date